

NEM:VC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

24-MJ-447

TYRONE CHAVIS,

(18 U.S.C. § 922(g)(1))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

I, Michael McCarthy, duly sworn, deposes and states that he is an Detective with the New York City Police Department (“NYPD”), duly appointed according to law and acting as such.

On or about June 25, 2024, within the Eastern District of New York and elsewhere, the defendant TYRONE CHAVIS, knowing that he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess in and affecting interstate or foreign commerce a firearm, to wit: one Taurus 9mm handgun, bearing serial number ABA205726.

(Title 18, United States Code, Section 922(g)(1))

The source of your deponent’s information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Detective with the NYPD and have been a member of the NYPD for 17 years. I have been involved in the investigation of numerous cases involving the recovery of firearms and ammunition. I am familiar with the facts and circumstances set forth below from personal knowledge; my review of documents, records and reports, including the defendant's criminal history record; and reports of other law enforcement officers involved in the investigation. Unless specifically indicated, all conversations and statements described in this affidavit are related in sum and substance and in part only.

2. I am familiar with the facts and circumstances set forth below from my participation in this investigation; my review of documents, records and reports, including the defendant's criminal history record; and reports of other law enforcement officers involved in the investigation. Unless specifically indicated, all conversations and statements described in this affidavit are related in sum and substance and in part only.

3. On July 15, 2015, CHAVIS pleaded guilty to being a felon in possession of a firearm, in violation of Title 18, United States Code, 922(g). (United States v. Tyrone Chavis, No. 15-CR-143). On February 26, 2016, CHAVIS was sentenced to 71 months' imprisonment to be followed by three years' supervised release. CHAVIS was released from federal custody on or about November 27, 2020.

4. On March 9, 2021, a report of a violation of supervised release was submitted to the Honorable Sterling Johnson, U.S. District Judge in the Eastern District of New York, charging CHAVIS with violating the terms of his supervised release. An arrest warrant was issued on March 15, 2021.

5. Between April and June 2024, the NYPD gathered information that CHAVIS was distributing narcotics. Thereafter, an I-Card was issued, indicating that there was

probable cause for CHAVIS's arrest. In the course of this investigation, NYPD officers also learned of CHAVIS' open federal arrest warrant.

6. On the evening of June 25, 2024, NYPD officers seeking to arrest CHAVIS on his open I-Card and outstanding federal arrest warrant, observed an individual believed to be CHAVIS riding an electric scooter. The officers approached that individual and asked for his identification. The individual produced his identification which showed that he was in fact CHAVIS.

7. CHAVIS was placed under arrest. At the time of his arrest, CHAVIS was wearing a crossbody bag across his chest. To ensure the officers' safety, one of the officers manually manipulated the bag, determined it contained an item with a shape consistent with a firearm, opened the bag and discovered a firearm.

8. The firearm was a loaded Taurus 9mm semiautomatic pistol with serial number ABA205726. The firearm was loaded with eleven rounds and an additional round in the chamber.

9. A picture of the seized firearm and ammunition is included below:



10. I have reviewed CHAVIS's criminal history, which revealed, among other things, that in 2016 CHAVIS was sentenced to a term of 71 months' imprisonment and three years' supervised release after being convicted of being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1), a crime punishable by a term of imprisonment for more than one year.

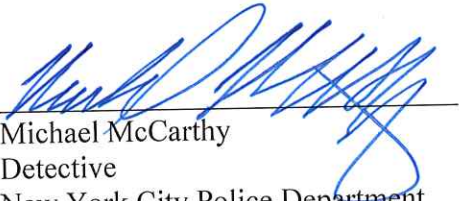
11. In 2010, CHAVIS was also sentenced to 40 months' imprisonment and three years' supervised release after being convicted of being a felon in possession of a firearm,

in violation of 18 U.S.C. § 922(g)(1), a crime punishable by a term of imprisonment for more than one year.


12. On or about January 3, 2007, CHAVIS was also convicted of Criminal Sale of a Controlled Substance in the Third Degree, in violation of New York State Penal Law § 220.39, a crime punishable by a term of imprisonment for more than one year, and was sentenced on January 24, 2007 to two years' imprisonment and two years' post-release supervision.

13. Law enforcement has conferred with an interstate nexus expert, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and I have been informed that, in substance and in part, that the firearm was manufactured outside the state of New York.

WHEREFORE, your deponent respectfully requests that the defendant TYRONE CHAVIS be dealt with according to law.


Michael McCarthy
Detective
New York City Police Department

Sworn to before me on this
27 day of June, 2024


THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK